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**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

ROLON MORRIS,

Plaintiff,

v.

CLARK PACIFIC, a California General  
Partnership; and DOES 1 – 20, inclusive,

Defendants.

Case No. 2:20-cv-01291-WBS-CKD

STIPULATION TO CONTINUE PRETRIAL  
DEADLINES; ORDER

Pursuant to Civil Local Rule 143, Plaintiff Rolon Morris (“Plaintiff”) and Defendant Clark Pacific (“Defendant”) (collectively the “Parties”), by and through their respective counsel, hereby submit this Stipulation to Continue Pretrial Deadlines.

Recitals

1. Plaintiff filed this action on June 29, 2020 (Dkt. 1), and filed a first amended complaint (operative complaint) on August 31, 2020 (Dkt. 11).

2. Defendant filed an answer to the first amended complaint on November 19, 2020. (Dkt. No. 23)

3. On January 5, 2022, the Court approved the consensual substitution of counsel for Plaintiff. (Dkt. No. 33)

4. Thereafter, on January 18, 2022, the parties requested a continuance of the trial date and pretrial deadlines, which the Court granted. (Dkt. No. 36.) The parties previously sought and were granted a continuance of pretrial deadlines in December 2021 during which time Plaintiff was searching for new counsel.

5. Trial in this matter is set for February 21, 2023. (Dkt. No. 36)

6. The discovery schedule in this matter is as follows:

a. September 16, 2022: Fact discovery cutoff; pretrial motion filing deadline

b. October 3, 2022: Expert disclosures and reports due

c. November 1, 2022: Rebuttal expert disclosures and reports due

d. November 23, 2022: Expert discovery cutoff. (Dkt. No. 36)

7. Good cause supports the 30-day requested continuance of fact and expert discovery deadlines. The parties are diligently working to complete fact discovery but are unable to do so within the present deadline due to summer scheduling conflicts and the unanticipated unavailability of third parties. This request for a continuance of pretrial deadlines is modest, 30 days, and will not affect the trial date. The parties agree that prejudice will result if a continuance is not granted, and that the length of the requested continuance is reasonable under the circumstances.

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Stipulation

The Parties, by and through their respective counsel, therefore stipulate and agree, and respectfully request that the Court issue an order continuing the discovery and motion deadlines as follows:

- a. October 17, 2022: Fact discovery cutoff; pretrial motion filing deadline
- b. November 2, 2022: Expert disclosures and reports due
- c. December 1, 2022: Rebuttal expert disclosures and reports due
- d. December 23, 2022: Expert discovery cutoff.

**IT IS SO STIPULATED.**

Dated: August 17, 2022

CALIFORNIA CIVIL RIGHTS LAW GROUP

By: /s/ Julianne Stanford  
Julianne Stanford  
Attorney for Plaintiff  
ROLON MORRIS

Dated: August 17, 2022

COOK BROWN, LLP

By: /s/ Terry Wills  
Terry Wills  
Attorney for Defendant  
CLARK PACIFIC  
*As authorized on*

**ORDER**


Based upon the foregoing Stipulation and for good cause appearing thereon, the Court orders as follows:

The discovery deadlines are continued as follows:

- a. October 17, 2022: Fact discovery cutoff; pretrial motion filing deadline
- b. November 2, 2022: Expert disclosures and reports due
- c. December 1, 2022: Rebuttal expert disclosures and reports due
- d. December 23, 2022: Expert discovery cutoff.
- e. The Pretrial Conference is continued from December 19, 2022 to **January 30, 2023 at 1:30 p.m.**
- f. The Jury Trial is continued from February 22, 2023 to **March 21, 2023 at 9:00 a.m.**

**IT IS SO ORDERED.**

Dated: August 17, 2022

  
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WILLIAM B. SHUBB  
UNITED STATES DISTRICT JUDGE